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Subject: Docket No FAA-2013-0485: Notice No. 1209 request for change allowing US Part 91 operators to receive an LOA under Part 91 to 100' for EFVS operations.

Dear FAA,

Verizon requests a change to docket number FAA-2013-0485 to provide an LOA to Part 91 Operators to conduct EFVS operations to 100 feet for foreign (International) Operations.

The Proposed rule acknowledges foreign states may require an LOA for US Part 91 operators to qualify for authorization to conduct EFVS operations to 100 feet yet the FAA denies those operator relief by not providing the LOA either presently or in the proposed draft of Docket 04985.

Verizon request the FAA to provide a process for Part 91 operators utilizing EFVS to 100' to obtain an LOA for Part 91 for operations in foreign airspace.

This process is currently available for ADS - B Out operators desiring authorization to conduct those operations in international airspace through AC-90-114. ADS B Out operations involve a simple "ON or OFF" option yet the FAA requires an LOA for foreign operations. A similar solution should be provided for EFVS to 100' operations. Currently and under the proposed Docket the FAA denies an LOA for EFVS operations to 100' for Part 91 operators even though the Docket requires those operators to meet formal training and currency similar to Touch Down and Rollout operators to whom an LOA is required.

Verizon has conducted EFVS operations since 2004 and initially trains all of its pilots on EFVS operations through an approved Part 142 training program and requires three (3) EFVS approaches every six (6) months. Yet we cannot obtain authorization to conduct EFVS operations in the UK because the FAA will not issue an LOA to 100' for foreign operations to Part 91 operators. Verizon has partitioned our POI to obtain an LOA or a letter from the FAA stating we are compliant with FAA regulations and therefore should be allowed to receive a UK LOA to conduct operation to 100' under UK regulations. Nevertheless, FAA Washington has denied our request. FAA Washington continues to do so in Draft 0485 by denying Part 91 operators of EFVS to 100' a FAA LOA to apply for a foreign LOA.

Docket 0485 even admits this is an issue but denies relief for FAR Part 91 Operators of the LOA so a a foreign LOA for EFVS operations to 100' may be obtained. Verizon

embraces the FAA desire for formal training of Part 91 operators to conduct EFVS operations to 100' as Touch Down and Roll out operators. Yet we seek relief in the form of an LOA for EFVS operations to 100' for international operations for the required training.

The lack of an LOA for foreign EFVS operations to 100' has caused Verizon to conduct normal ILS operations even though we have equipped our Gulfstream Fleet with EVS.

Verizon has partitioned the UK and the FAA to provide approval of UK operations without the LOA. Neither the FAA nor the UK CAA will make exception. An FAA LOA is required by UK CAA and without it we cannot obtain EFVS to 100' approval in the UK

Please feel free to contact me at (973) 451-6606, or via email at wayne.colyer@verizon.com with any questions.

Sincerely,

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